

US EPA ARCHIVE DOCUMENT

Web-Distribution of Labeling Workgroup Discussion Paper Education & Culture Change

Issue

An effective communication strategy that informs pesticide users about the transition to web-distributed labeling, how to obtain labeling, and their continued responsibility to comply with the labeling is necessary to ensure that web-distributed labeling provides at least the same, if not a greater, level of protection for public health and the environment as traditional paper-based labeling.

Background

Product labeling is the primary mechanism used by EPA to communicate critical information to the pesticide user. The labeling contains use directions, health and safety information, and instructions for proper disposal, as well as other important information. Both FIFRA and pesticide labeling regulations assume that users will follow the use instructions on the label and labeling for registered products; users that do not comply with labeling directions are subject to penalties for non-compliance. To protect human health and the environment from the risks associated with pesticide misuse or misapplication, it is of the utmost importance that pesticide users follow labeling instructions.

Traditionally, labeling has accompanied the product and is provided to users at the point of sale, commonly as a leaflet or booklet. Web-distributed labeling would make the most current version of pesticide labeling available to users on the internet and through alternate delivery mechanisms. This change will affect stakeholders throughout the product distribution chain. Registrants, states and EPA will move towards electronic labeling, distributors will not be able to reference the labeling accompanying a product when making sales, and users would have to adapt to a new way of getting product labeling. The responsibilities of the user to obtain and follow all label and labeling instructions would not change under a web-distributed labeling system. If users do not obtain and follow the labeling as required, there is a potential for increased risk to both the public and environment. Therefore, it is essential to develop and implement a comprehensive communication plan to educate users and those who educate or make recommendations to users about web-distributed labeling.

Any outreach effort must address the anticipated confusion with both paper-container labels being on some products while a small sub-set of products carry the web-distributed labeling. It is likely that especially during the pilot, users will have the option of purchasing the product accompanied by the full labeling,

A clear, consistent message delivered repeatedly to the user, and on which he will act, is a critical component to achieving the culture change necessary for web-distributed labeling to be successful. Web-distributed labeling will be a major change for pesticide users. Although many may be familiar with using the internet, they have not relied on it for pesticide labeling. In addition to ensuring the message reaches the pesticide user, it is critical to educate the stakeholders engaged throughout the lifecycle of a pesticide. A

number of pathways exist that provide information to pesticide users: pesticide manufacturers, trade associations, user groups, cooperative extension service, dealers, state regulatory agencies, and state enforcement programs. Educating these stakeholders will be a necessary component of successful implementation of web-distributed labeling; helping them to understand the functionality and benefits of web-distributed labeling will allow them to pass the information to the end user.

This paper will explore the types of communication messages, how they will be delivered and who should be involved in development and dissemination of the information. The messages for the pilot and full-scale implementation will be similar. Although it may be necessary to tailor the information to specific audiences, locations and products for the pilot, the underlying issues are the same.

What types of communications are anticipated?

Widespread culture change will require a sustained and concentrated effort that includes complementary outreach from EPA, registrants, Cooperative Extension personnel, State Lead Agencies, trade associations, user groups, dealers and consultants. It will be critical to communicate the following key points in a repeated, clear and consistent manner to all users so they recognize and act on the messages, i.e. download and comply with labeling.

- Web-distributed labeling will replace paper-based labeling on some products in the marketplace, but not all products
- There are several ways to obtain web-based labeling: internet download, fax, or mail
- Users still must have a copy of labeling at the time of application and comply with all use restrictions and instructions

A well-structured, consistent message for adaptation and use by all stakeholders will facilitate dissemination of consistent information to users through a number of avenues. Some of the decisions on what to include in the message and how materials should be developed will be based on other aspects of implementation of the program, including the types of products to carry web-distributed labeling or paper labels, the alternate delivery mechanism, and labeling lifespan. The message may have to be refined at the state and local level, depending on the resources available to the pesticide user. For example, in some localities a user may be able to access the internet or obtain labeling through his local library, dealer, county extension agent or crop advisor. Regardless of such potential local differences, all communications should contain the underlying messages above.

In addition to the basic messages outlined above, the communication messages and strategies should highlight the benefits of web-distributed labeling to each stakeholder group. Users in particular will benefit by having access to more concise labeling tailored to use in a specific state, on a specific crop and possibly using a specific application method. In addition, if the websites offer additional features that would appeal to users – e.g., demonstration videos or other educational information, messages should emphasize these features. Further, it is more likely that other stakeholders will embrace their roles in supporting web-distributed labeling if they are educated on how the initiative will enhance, simplify or otherwise improve their experience with pesticide labeling. EPA,

States and registrants could benefit from a streamlined workflow, more timely realization of changes to labeling, and increased compliance due to more concise labeling. Dealers will be able to direct users to a website for the most current product labeling, rather than handling paper-based updates and lengthy labeling attached to or accompanying pesticide containers. Tying the benefits into the communications message will be an important part of marketing web-distributed labeling and achieving culture change.

Who should be involved?

A core set of materials need to be developed. Issues for consideration include who will be responsible for developing and funding the materials. The multiple sources of information available to users should be represented in the development of the communications message. A non-exhaustive list of potential participants follows.

EPA

EPA uses labels and labeling as the primary mechanism through which to communicate with pesticide users. EPA bears a responsibility to support efforts for users to download and follow labeling requirements in order to ensure that transitioning to a new system does not result in any reduction in protection to the public and the environment.

Registrants

Registrants are responsible for ensuring that complete and accurate labeling is distributed with each product. Many registrants have strong stewardship programs, providing training and outreach on their products to dealers and users.

Cooperative Extension Service

USDA's Cooperative Extension Service (CES) includes state level coordinators, specialists and county agents. CES serves primarily agricultural (private) and commercial pesticide users, providing initial certification training, recertification training and information on pests, pesticides and other related issues. Since CES is a primary source of delivering new information to pesticide users, it is critical to ensure CES is engaged in development and dissemination of the necessary communication messages.

State Regulatory and Enforcement Agencies

As co-regulators, state lead agencies (SLAs) register products, certify certain types of pesticide applicators and have authority to conduct certain enforcement actions. SLAs are often front-line communicators with those undergoing routine and targeted inspections, providing compliance assistance or administering penalties, depending on the circumstances.

Trade Associations & User Groups

Trade associations and user groups support the needs of their members. These organizations represent groups of growers, dealers, formulators and distributors or registrants, all of whom have a stake in ensuring that web-distributed labeling is implemented effectively and efficiently.

Pesticide Dealers & Advisors

Pesticide dealers often do more than sell pesticide products. Often they provide additional services to their customers such as information and advice to people making decisions about selecting a pesticide. They serve as a critical link between the pesticide registrant and the user.

Pesticide Users

Users will be an essential component of the communication strategy. Affecting culture change throughout the user community would benefit from word of mouth endorsements of the web-distributed labeling system. Feedback from users will also help tailor the both message and the web-distributed labeling system, making them more effective and responsive to the needs of users.

How will the messages be delivered?

The organizations listed above should be involved in developing a strategy for collaboratively conducting outreach in order to ensure that culture change regarding web-distributed labeling occurs in the most effective manner possible. This message will be delivered most effectively if responsibility is shared, because each individual organization has its own expertise, experience and reach into the user community.

The same message should be presented multiple times and by multiple sources to reach all users. To ensure that users recognize the message in every possible scenario, web-distributed labeling should have a logo or slogan that is used on all materials, regardless of who develops or delivers them. The message should be conveyed so that the audience understands how they will benefit, e.g. download labels for specific uses and access to new uses in a more timely manner. Enforcement, through compliance assistance and potential penalties, should be employed to reinforce the message.

Users need to understand the new labeling distribution system before these products become marketed nationally. Especially for purposes of the pilot, it will be critical to have sufficient lead time before implementation in order to begin outreach to pesticide users and other stakeholders. Those delivering the web-distributed labeling message to users should have an understanding of it and their role as educators and information sources at least 6 months before the pilot begins. EPA must recognize the timing of training for large portions of the country occurs during the late fall and winter season. Training during growing season does not happen.

Conclusion

This paper outlines the key messages associated with implementation of web-distributed labeling, the key participants for outreach, and a broad outline of how the messages should be delivered. Many issues surrounding this issue, including who will pay for the program, who will deliver the materials, what materials will be developed and who will develop materials depend on further refinement of the scope, pilot, hosting, and lifespan issues.